

# **Vermont Department of Disabilities, Aging and Independent Living**

## ***State Plan of Program Operation and Administration Commodity Supplemental Food Program (CSFP)***

### **SECTION I. GOALS AND OBJECTIVES**

Goal 1: Maintain the current caseload allotment of 4705.

Goal 2: Increase the number of partnering agencies willing to serve as proxy agents for CSFP recipients.

Goal 3: Continue to consolidate delivery routes in order to have a more efficient and economical delivery system.

Goal 4: Strengthen communication to CSFP recipients and to support services in the community who serve low income seniors, women and children.

Goal 5: Strengthen ongoing outreach and marketing to potential participants and community partners.

### **SECTION II. PROGRAM DESIGN AND OPERATIONS**

#### ***A) STATE AND LOCAL AGENCY IDENTIFICATION***

**Reference:** 247.3(b)

**Citation:** If distribution of supplemental foods or other Program operations at the State level are performed by an agency of the State other than the State agency, the State agency shall enter into a written agreement with the other agency.

The Vermont Department of Disabilities, Aging, and Independent Living (DAIL) contracts with the Vermont Food bank (VFB) to order, receive, warehouse and distribute CSFP foods. The written agreement is on file at the DAIL office.

#### **Participating Agency Agreements & Service Areas**

**Reference:** 247.5(a)(1)

**Citation:** The names and addresses of each local agency:  
(i) which have an agreement with the State agency for program administration;  
and  
(ii) the names and addresses of each certification, food distribution and storage site under the jurisdiction of the local agency.

The Vermont Department of Disabilities, Aging, and Independent Living are the designated State agency for the Commodity Supplemental Food Program in Vermont. CSFP enrollment and certification may occur through the VFB or at CSFP distribution sites throughout the state. Address listings and contacts for the designated state agency and the VFB are listed in *Appendix A*. CSFP Food Distribution Sites are shown in *Appendix B*.

## ***B) CERTIFICATION CRITERIA AND PROCEDURES***

**Reference:** 247.5 (a)(2)

**Citation:** The specific income criteria and nutritional risk criteria (if any) to be used in certifying persons as being in need of supplemental foods and the period of time covered by certifications in each local agency.

### Income Criteria

Women, infants or children are income-eligible for CSFP if their household's gross cash income (excluding the value of food stamps or other public program benefits specifically excluded by law from consideration as income) is at or below 185% of federal poverty thresholds, or if they are enrolled in the Medicaid, Food Stamp or Aid To Needy Families With Children (ANFC, Vermont's version of the Federal TANF) Programs.

Elderly persons (aged 60 or older) are income-eligible for CSFP if their household's gross income is at or below 130% of federal poverty thresholds.

### Method to Determine Applicants' Income and Age

A CSFP Application Form must be completed before enrollment in the program. The application includes the date of birth and household income. An applicant seeking eligibility based on age (e.g., elderly person or child under six) must present a document confirming the applicant's age, such as a birth certificate, driver's license or similar document. A baby's birth certificate or other acceptable record of pregnancy confirmation, birth or termination of pregnancy may serve as documentation. Applicants may complete an Affidavit Attesting to Age form if this information is not readily available.

### Nutritional Risk Criteria

At this time, Vermont will not use nutritional risk criteria to determine CSFP eligibility or certification priorities.

### Residency Requirements

Vermont residency must be established. Length of residence will not be considered in determining eligibility. Participants are able to pick up food outside of the district they live in either personally or via designated proxy, if the town location is closer to that individual or it facilitates their participation in the program. An individual residing in a nursing home, community care home, residential school, correctional facility or other residential facility does not qualify for CSFP.

## Waiting Lists

The VFB will monitor caseload levels and notify the DAIL when procedures for limiting caseloads must be implemented. When the maximum CSFP caseload has been reached, additional applicants will be placed on a waiting list. Wait-listed applicants will be provided information about food shelves or other potential sources of food assistance.

A waiting list will be kept of applicants who are not certified due to their status as members of an underserved priority group. Persons whose categorical eligibility will expire within three months, and persons who are not within the priority groups likely to be served, will not be placed on this list, unless an individual specifically requests placement on the waiting list will be denied inclusion.

Any person placed on a waiting list will be so notified within 20 days of the date of application, and the form of notification will be based on the method of the request. If a personal or telephone inquiry was made without completion of an application, the notification may be verbal at the time of inquiry. If the request was in writing, the applicant will be mailed a Notice of Cancellation/Denial/ Placement on CSFP waiting list. The waiting list will include the applicant's name, address, phone, date of application, status, date notified of waiting list status, and method of notification.

When additional CSFP slots become available eligible applicants will be assigned to distributions based on the date of application and priority category below. The priority categories, and the order in which applicants will be scheduled as slots become available, are as follows:

- Priority I: Pregnant women, breastfeeding women and infants
- Priority II: Children ages 1 through 3
- Priority III: Children ages 4 through 5
- Priority IV: Postpartum women
- Priority V: People aged 60 or over

## Process to Inform Applicants of Rights & Responsibilities

Applicants will receive verbal and written information concerning their rights, fair hearings and dual participation when certification documents are signed.

## Certification Periods

**Pregnant Women** are certified for the duration of their pregnancy and for up to 6 weeks postpartum.

**Infants and Children** are certified at intervals of approximately six months, ending with the month in which the child reaches the sixth birthday.

**Postpartum women** are certified for up to six months postpartum, not to extend beyond one year following completion or termination of pregnancy.

**People aged 60 or over** are certified at intervals of six months.

## Procedures to Detect Dual Participation

**Reference:** 247.5 (a) (10)

**Citation:** A plan for the detection of dual participation within the jurisdiction of the State agency. In States where the CSFP and an Indian State agency for the CSFP or WIC Program State agency operate in the same area, a copy of the written agreement between the State agencies for the detection and prevention of dual participation must be submitted.

On a mutually agreeable schedule, and to the extent permitted by program regulations, staff will compare selected data fields of new client records in each program with similar data fields in the other program to identify possible dual participants. If a possible dual participant is identified, the program that has had the most recent contact with the participant will investigate whether dual participation actually occurred.

If a participant is determined to be receiving benefits from more than one program or distribution site, the participant will receive a notice of suspension/termination and information on how to request a fair hearing.

A copy of the agreement between WIC and the VFB is on file at the DAIL office.

## Health and Social Services Information and Referral

**Reference:** Food, Agriculture, Conservation and Trade Act of 1990 (Farm Bill)

**Citation:** The State agency must ensure participants are provided basic information on, and when appropriate, referrals to, other health and social services.

At the time of certification all applicants and participants will be offered information and referrals to other health and social services, as available and appropriate. These may include, but are not necessarily be limited to: Supplemental Security Income, Medicaid, child support services, Food Stamps, ANFC, substance abuse counseling/treatment programs, the Vermont Health Assistance Program, EPSDT, elderly and child nutrition programs. Information about pertinent health or social service programs is also included in the food packages as appropriate. For example, fuel assistance applications and a flyer about mercury in fish were included with food packages this year.

### **C) CASELOAD MANAGEMENT & REQUESTS**

**Reference:** 247.5 (a)(3)

**Citation:** A description of any plans for requesting program expansion or major redistribution of caseloads within the State for forthcoming caseload cycle.

The current assignment for the 2005 caseload cycle is 4705. CSFP food boxes distributed this fiscal year to date:

October 2004	4695	March 2005	4490
November 2004	4518	April 2005	4614
December 2004	4311	May 2005	4563
January 2005	4739	June 2005	4488
February 2005	4590	July 2005	4593

Vermont would like to maintain the current caseload allotment. As Vermont moves toward more home and community based care for frail seniors, CSFP becomes an important component in helping low income seniors afford to live independently. **Estimated participation for FY 06: 46900 seniors, 105 women, infants and children.**

#### Geographic Area Served

CSFP is available to people in all geographic areas of the state. Because of the rural nature and rugged terrain in the state, there are 152 distribution sites. Routes are set up so that people will not have to travel more than 25 miles for food pick up. Rising transportation costs have increased the cost of delivering CSFP food boxes. Every effort is being made to consolidate distribution routes in the most efficient manner.

#### CSFP Outreach

**Reference:** 247.5 (a)(4)

**Citation:** A description of any plans for conducting outreach to ensure that all women, infants, children and elderly persons are aware of program benefits.

DAIL in concert with the VFB has worked steadfastly to provide outreach materials and collaborate with local agencies throughout the state to increase awareness of CSFP. Activities include visits to senior centers, area agencies on aging, senior housing developments, PSA's, radio talk shows, regular feature in Congressman Sander's newsletter, and displays at conferences. Outreach materials are made available to health and medical organizations, visiting nurses, community action agencies, area agencies on aging, senior centers, UVM Extension staff, religious or other community organizations in low income areas, local food shelves, and to offices of state government departments offering employment, social service, health, welfare or other services to low income Vermonters. The CSFP hotline, which serves the entire state, is made available on all promotional material. Public officials such as legislators and town clerks also are informed about the CSFP so that they may refer interested constituents to the program. Broadcast media such as radio and television has been used to announce the availability of program benefits.

The Agency of Human Services collocates its departments (e.g., Health, Social Welfare, Social and Rehabilitation Services) to facilitate a mutual sharing of information and interdepartmental referral for programs offered by the various departments. Also, Vermont's state and private social service agencies are noted for working collaboratively, in many cases with area businesses also taking part, in order to make the best use of resources available to identify and assist persons who may need and qualify for program services. Such a team approach extends the reach of CSFP information to potential participants who might not otherwise learn about the program.

#### Plan for Serving Elderly Persons

**Reference:** 247.5 (a)(15)

**Citation:** A description of the plans for providing program benefits to elderly persons within the State during the caseload cycle. Such description shall include an identification of the elderly population to be served, including documentation of the extent of need in the proposed service area.

- An estimated 14,600 Vermonters aged 60 or older are income-eligible for the CSFP, and over 10,000 of them are living below the federal poverty level.
- The 2000 Census shows that 11.2% of Vermonters age 65 or older are living below the poverty level.
- Residents age 75 and older grew to 47.5% of the total population over age 65. This rapidly growing segment of the population is especially vulnerable to the effects of poverty and are at risk for malnutrition.
- With the exception of Chittenden County, all of Vermont is considered to meet the federal of definition of "rural".
- Rural elders are more likely to live in poverty than those in metropolitan regions because of lower lifetime earnings, investments and savings, as well as lower social security benefits and other pensions.
- Rural elders have less access to key services such as health care, social services and housing.
- Rural elders usually have to travel farther to access these key resources, and yet at the same time, have less access to transportation.

The CSFP is an important nutrition resource for Vermont elders. One out of five households served by Vermont's emergency food shelves includes an elderly person, and a quarter of the community kitchen meals are being served to senior citizens. Only 5,367 older Vermonters receive food stamp benefits, in many cases due to social stigma as well as the relative complexity of program rules and procedures. The federal TEFAP commodity program attracted low income older Vermonters who would otherwise refuse to apply for services like food stamps or food shelf assistance because the social cost of using such programs appeared to outweigh the benefits.

Vermont elders are served by five Area Agencies on Aging (AAA), whose service areas are shown in Appendix C. The estimated number of CSFP eligible elders per area follows.

Central Vermont Council on Aging	2,840
Champlain Valley Agency on Aging	4,384
Area Agency on Aging for Northeastern Vermont	2,133
Council on Aging for Southeastern Vermont	2,737
Southwestern Vermont Council on Aging	<u>2,518</u>
	14,613

#### Process for Serving Homebound Elderly

**Reference:** 247.5 (a)(15)

**Citation:** A description of how the State agency will meet the needs of the homebound elderly.

The DAHL collaborates with the five Area Agencies on Aging (AAA's) that operate elderly nutrition programs and serve elders through other federal programs. AAA staff that make home visits are able to collect the required CSFP information needed for certification. Access is enhanced by a liberal policy using participant-designated proxies for certification and food distribution.

In order to make the CSFP program accessible to eligible individuals who are physically unable to pick up the food package, certifying agents are encouraged to promote the use of proxies or to arrange home delivery to the extent that resources permit. Home delivery services are arranged through community partners, staff of social service agencies serving the homebound elderly, or volunteers.

#### ***D) NUTRITION EDUCATION***

**Reference:** 247.5 (a)(5)

**Citation:** The plan for nutrition education services for the fiscal year. The nutrition education portion of the State Plan shall include an evaluation component which includes a systematic procedure for participant input.

#### Nutrition Education Goals

The goals of CSFP nutrition education are: (1) to stress the relationship between proper nutrition and good health, with special emphasis on the nutritional needs of pregnant, breastfeeding and postpartum women, infants and children under the age of six, and elderly persons aged sixty or older; (2) to maximize the nutritional benefits received from CSFP foods; and (3) to improve participants' health status by achieving positive changes in dietary habits that continue after they stop participating in the CSFP.

## Nutrition Education and Resources

CSFP participants are provided with printed nutrition education material including recipes, brochures, and newsletters each month. DAIL continues to develop and implement procedures to ensure that CSFP participants are offered nutrition education consistent with the goals stated above.

Other educational opportunities such as cooking or food preparation demonstrations, individual or group classes, with special emphasis on the use and nutritional benefits of the CSFP foods have been offered in collaboration with the AAA's, the University of Vermont Extension and other food, nutrition and health care professionals.

## Nutrition Education Training

Nutrition education will be driven in part by any trends and concerns that are noted in the customer satisfaction survey. Nutrition education and training will be provided by DAIL nutritionists and/or Registered Dietitians on contract with AAA's. Individual and group training will be tailored to the special circumstances and nutrition needs of CSFP participants.

## Evaluation Methods

Under the guidance of the DAIL Nutritionist, a sample of participants will be asked to evaluate the effectiveness of educational materials and/or activities by responding to a customer satisfaction survey given to participants with their CSFP food package. Completed surveys will be mailed to the DAIL for analysis. Results of this survey will drive nutrition education plans and services for the year.

## Customer Satisfaction Survey

A customer satisfaction survey was last conducted and completed in the fall of 2004, the results of which were summarized in the 2004 state report. Vermont participated in a national CSFP survey that was conducted in June 2005. The next statewide customer satisfaction survey will be conducted in 2006.

## ***E) FOOD DELIVERY SYSTEM***

**Reference:** 247.5 (a)(6)

**Citation:** A detailed description of the manner in which foods are distributed to each local agency and to participants by the local agency.

## Overview of Food Delivery System

The VFB places monthly food orders according to the established schedule; serves as the consignee for food delivered by USDA to Vermont; monitors programmatic food damage and inventory gains and losses; prepares monthly FNS 153 reports; handles receipt, storage, site delivery, issuance and disposal of commodities. Participants are issued a monthly food package, pre-determined according to appropriate food group category, and receive food packages by self pick-up, group pick-up or home delivery. The VFB issues food packages on a monthly basis. Certification and issuance data are entered into the MIS master file daily.



Detailed inventory and issuance records are compiled daily by distribution sites. The VFB maintains food receipt data, site food delivery bills of lading and monthly physical inventory, documentation of USDA commodities received, and food destruction logs. All food distribution reports are computer generated.

#### Transportation Resources and Procedures

The VFB will deliver food via a tailgate distribution system throughout the state and via direct deliveries at low income senior housing facilities and other senior gathering sites. Distribution schedules are developed and maintained at the VFB.

#### Storage Facilities and Procedures

The VFB receives, warehouses and manages CSFP foods, which is ordered from the inland warehouse located in Carthage, Missouri.

The VFB prepares food estimates and orders food in accordance with USDA instructions. Quantities and types of foods are ordered based on caseload projections, food package contents, and discretionary food types for use each month.

#### Ordering Procedures

The VFB determines which discretionary food items will be offered each month. The VFB uses a spreadsheet program to calculate the number of units of each food item required to be ordered for each month's issuance based on the number and type of participants projected, the issuance rates established for each food item, take-rates projected for each food item and the latest month's ending physical inventory balances. The totals are then combined into full-truck equivalents planned for delivery to the appropriate warehouse prior to the scheduled issuance month.

Dollar value of foods ordered will be calculated and tracked in spreadsheet form, and adjustments to the variety of foods specified, if necessary to remain within authorized limits.

The VFB submits food orders 45 days prior to delivery, based on the USDA list of available foods. The most recently completed month-end physical inventory is used to validate the quantity ordered of each food item. Major discrepancies in the need for product and the amount ordered are reviewed to determine whether the order needs revision, and changes to the order are communicated at this time.

#### Distribution Methods and Frequency

CSFP foods are distributed through 'tailgate' operations at predetermined delivery sites or as direct delivery to low income senior housing facilities. Based on participant scheduling and anticipated issuance, individual food packages are pre-packed at the warehouse and shipped to the distribution sites. When the commodities arrive at the distribution site, the site supervisor takes a physical inventory, verifies any discrepancies and adjusts the perpetual inventory as necessary.

Participants arrive at distribution sites to be certified if necessary and to pick up their monthly food package. The participant or authorized proxy signs certification and/or food issuance documents, and then pick up the food package. Any refusals are noted in the database, deducted from the food package received, recorded on the issuance document and returned to inventory.

### Safeguards Against Theft or Loss

The VFB is responsible for safeguarding CSFP foods from theft, spoilage, damage, destruction or other loss. All facilities used for storage of CSFP foods must be approved in advance and will be inspected at least once a year to assure that foods are stored at appropriate temperatures, and that the facility is safe, secure, and sanitary. Stock is handled on a first in, first out basis, unless stock with older pack dates is received later than “new” foods.

The physical inventory is conducted on a monthly basis. When foods are received from USDA the VFB verifies types and quantities of foods received and the condition of foods received. Any damaged or otherwise substandard foods will be removed from the storage inventory disposed of through appropriate means by the VFB.

### Inventory Procedures

A physical inventory and computer system inventory is maintained simultaneously. A CSFP spreadsheet program is used to document the types and quantities of food items ordered and received from USDA. A month-end physical count of cases and units of foods on hand will be reconciled with records of receipts and food packages disbursed. A State Agency final reconciliation of inventory is completed with-warehouse month-end reports, which are-records compared to the system tallies and any discrepancies investigated. The month-end inventory is adjusted, if necessary, to the actual physical inventory reported.

### Method for Estimating Quarterly Food Needs

Quantities of foods to be ordered from USDA are based on the caseload slots available, the maximum food quantities for the caseload and caseload mix projected to be served for the distribution month, and the amount of food remaining in inventory at the time the order is submitted. The monthly issuance data reported by the district offices would be used to update food issuance and inventory projections.

### Insurance Coverage for Value of CSFP Foods

The VFB is required to maintain warehouseman's legal liability insurance in an amount adequate to cover any losses arising from the warehouseman's failure to exercise the reasonable care and diligence required by law and imposed by contract, including but not limited to spoilage caused by failure to rotate stock. Minimum coverage requirements are determined based on the average quantity of CSFP foods stored at the warehouse and the provisions of Vermont's standard state contract.

## ***F) MANAGEMENT EVALUATION AND REVIEW***

**Reference:** 247.5 (a)(7)

**Citation:** A description of the manner in which the State agency plans to monitor each local agency.

## Monitoring Plan

The DAIL conducts an annual on-site monitoring visit and review of the warehouse. Random monitoring of delivery sites is ongoing.

## Monitoring and Corrective Action Procedures

The VFB warehouse is reviewed for cleanliness, security, safety and proper inventory and warehouse management. The department will make announced or unannounced inspections of these sites at least once a year in order to confirm that adequate food storage and distribution standards are being followed.

The monitoring protocol for the VFB will include a discussion of review findings on-site with the agency; specified time frames for providing a written review report and for taking corrective action measures if applicable; evaluation of the adequacy of corrective actions; and follow-up with the agency to ensure corrective action measures are implemented.

## ***G) STATE PLANNING PROCESS***

**Reference:** 247.5 (a)(8)

**Citation:** A description of plans to involve local agencies, participants and other interested parties in the development of the State plan for the next fiscal year.

Public comment is solicited both formally and informally for suggestions to incorporate into the annual state plan. The formal procedure consists of sending a letter requesting comments to all potentially interested parties, including participants, advocacy and partner organizations, members of the medical and social service communities and other organizations. A CSFP Advisory Board, consisting of congressional delegates and representatives from WIC, AAA's, Office of Economic Opportunity, the DAIL, senior housing, and the VFB meet on a quarterly basis to provide guidance on program development issues and evaluation including but not limited to caseload attainment, distribution improvements, survey tools and outreach.

The VFB and others in contact with potential CSFP participants will be notified that a state CSFP plan is being developed and invited to comment. This notification will summarize information about the program's eligibility criteria, benefits and process through which benefits would be delivered. Interested parties will be invited to call the DAIL toll-free number for details or to comment on the proposed plan. Comments and suggestions regarding the plan will be documented and filed with the department.

Less formal public comment consists of reviews of correspondence received during the year, comments, complaints and suggestions received on the toll-free hotline, informal discussions with CSFP participants and agencies and individuals providing services to the CSFP-eligible population, and comments received on the annual participant survey.

## ***H) FINANCIAL MANAGEMENT***

**Reference:** 247.5 (a)(9)

**Citation:** A description of how the financial management system will provide accurate, current and complete disclosure of the State's program, including an accurate accounting of all administrative funds received and expended.

### Financial Management System

All administrative funds to support the CSFP are deposited into the State Treasury. The CSFP is administered by the DAIL, whose Financial Management office is responsible for the accounting function. Accounting procedures for program funds adhere to policies and practices established by the State Finance and Management Department, which provides a uniform automated accounting system to all departments and agencies within state government. A unique account identifier code is assigned to each division and program to allow separate financial accounting by program. The State Treasurer's office also assigns a unique vendor number to each entity to whom payments may be made.

Payroll systems require that employees submit time reports showing the number of hours worked on specific programs during the pay period. Similarly, employee expense reporting procedures require that expenses reported for mileage or other allowed costs in the performance of CSFP duties must be identified.

### Procurement

The DAIL complies with all state and federal rules pertaining to procurement.

### Distribution of CSFP Administrative Funds

Because all 'local agencies' are in fact part of the State agency, administrative funds are managed centrally at the State agency office. Payments for staff time, equipment, supplies and other administrative expenses are made through the State's Finance system, described above.

### Annual Expenditure Report

Annual expenditure reports are submitted under separate cover according to the schedule established by USDA.

## ***I) COMPLAINT PROCEDURES***

**Reference:** 247.5 (a)(11)

**Citation:** Procedures developed in accordance with Section 250.22 and provided to local agencies for reporting, processing and resolving complaints about supplemental foods

A participant may address any complaint concerning program operations, program staff or food quality to DAIL or the VFB in person, in writing, or by using the toll free telephone number. In addition, the USDA toll-free complaint number (1-800-446-6991) will be provided to participants should they wish to make a direct complaint. The individual will be advised of any actions that may be taken to resolve the problem. (The procedure for complaints alleging discrimination is described separately in the Civil Rights segment of this plan. Oral complaints

will be accepted, and will be recorded on the complaint form. Anonymous complaints are discouraged; however, such complaints will be investigated at the receiving administrator's discretion. The VFB or DAIL will investigate the complaint within 30 days of receipt. Any complaint or problem that cannot be resolved to the participant's satisfaction will be forwarded to USDA for further review.

The VFB will be notified immediately of any complaint regarding the quality of CSFP foods received, and will forward the complaint to USDA. An attempt will be made to collect the suspect food items from the complainant, or, if this is not possible, obtain the lot number(s) from the packaging. The VFB will provide those items, or a sample of those items, to the CSFP manager at the DAIL, where they may be examined by a sanitarian or other specialist qualified to determine if the food item is substandard. If the findings are positive, a USDA Donated Commodities Complaint form will be completed by the CSFP manager and submitted to the FNS regional office, so other participating state agencies may be alerted to the problem if appropriate.

## ***J) AUDITS***

**Reference:** 247.5 (a)(12)(I)

**Citation:** A description of the audit procedures, including a description of the scope and frequency of audits of the State agency and local agencies, and a delineation of the procedures used to assure audit examination of the CSFP at a reasonable frequency. Audit agency guidelines for selecting a sample of grant programs for audit should be addressed.

### Audit Procedures and Frequency

All federal programs in Vermont are subject to the Single State Audit process, and are audited annually by an independent auditing firm, selected through sealed bid procurement and overseen by the State's Office of the Auditor General. Local Agencies have fall under OMB A-133 and have an annual audit. The State receives and reviews the local agency audit.

### Description of Audit Organization

**Reference:** 247.5 (a)(12)(ii)

**Citation:** A description of the audit organization is sufficient detail to demonstrate the independence of the audit organization.

The State and Local audits comply with the independence provisions required by OMB A-133 and A-87

**Reference:** 247.5 (a)(12)(iii)

**Citation:** The number of local agencies in which the CSFP was included in audits in the last four full quarters, and the number of local agency audits planned for the coming fiscal year which include examinations of the CSFP.

The Vermont Department of Disabilities, Aging, and Independent Living (DAIL) contracts with the Vermont Food bank (VFB) to order, receive, warehouse and distribute CSFP foods. Both organizations have annual audits.

## **K) CIVIL RIGHTS**

**Reference:** 247.5 (a)(8)

**Citation:** A description of the procedures the State will use to comply with the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964, the FNS Civil Rights Instruction 113-2, and with 7CFR Part 15, including racial and ethnic participation data collection, public notification procedures and the annual civil rights compliance review process. In addition, the Title VI coordination regulation (28 CFR 42.410), Department of Justice, requires each State agency to establish a Title VI compliance program for itself, local agencies and clinics.

### Process to Collect Racial/Ethnic Participation Data

The application form will include a section where the applicant can indicate a self-identified racial/ethnic category, which will be kept on file for all participants. Any racial/ethnic data collected on participants are accessible only to authorized personnel. The racial/ethnic categories are defined as:

**White:** A person not of Hispanic origin, having origins in any of the original peoples of Europe, North Africa or the Middle East

**Black:** A person not of Hispanic origin, having origins in the black racial groups of Africa.

**American Indian or Alaskan Native:** a person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal affiliation or community recognition, including Aleuts and Eskimos.

**Hispanic:** a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

**Asian or Pacific Islander:** a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

### Public Notification Process.

Program brochures, applications and other written materials will include a statement of non-discrimination. Program staff and contractors will produce applications and related materials in languages other than English for non-English speaking or limited-English speaking persons and utilize translator resources through the Agency of Human Services.

### Process for Responding to Discrimination Complaints.

When program staff receive a complaint of discrimination of any kind, they will promptly document it and forward it to the DAD. The department will conduct an investigation within 5 working days and respond to the complainant within 10 working days of the completed investigation. The DAD will also forward a copy of all complaints and investigation results to the Director of the Office of Equal Opportunity at USDA.

The use of this procedure does not preclude the complainant from also filing a complaint with the Vermont Human Rights Commission.

Contractor Reviews. At least annually, the DAD staff will review compliance by contractors with these procedures.

## ***L) FAIR HEARINGS***

### Fair Hearing Process for Participants

**Reference:** 247.5 (a)(14)

**Citation:** A description of the fair hearing procedures for participants.

All CSFP applicants denied program benefits will be informed in writing of their right to a fair hearing at the time they are notified that they are ineligible. This notification will outline the information needed for a fair hearing, and define the rights and responsibilities of all parties.

Persons seeking continued benefits may request a fair hearing within 60 days of the date of the notice of benefit termination. Applicants denied benefits at initial certification will not receive benefits before the hearing officer makes a decision. However, participants who are either denied benefits at re-certification or found ineligible during a certification period, and who request a hearing within 15 days of notice of termination shall continue to receive benefits until a hearing officer reaches a decision or the certification period expires, whichever comes first.

A request for a fair hearing may be denied if: (a) the request is not received with 60 days from the date the district office mails or gives the participant/applicant the notice of adverse action; (b) the request is withdrawn by the appellant or representative in writing; (c) or the appellant fails to appear at the hearing without a good cause.

Conduct for the fair hearing, including all notifications, is the responsibility of the Agency of Human Services. Hearings will be conducted by an impartial official with no personal stake or involvement in the decision and who was not directly involved in the initial determination of the action being taken. The Hearing Officer will: (a) ensure that hearings are scheduled within three weeks of the date the initial request is received in the district office; (b) provide written notice of the time and place of the hearing and an explanation of the hearing procedure to all parties at least ten days before the hearing date; (c) administer oaths of affirmations as required by the State; (d) ensure that all relevant issues are considered; (e) request, receive and make part of the hearing record all evidence determined necessary to decide the issues being raised; (f) regulate the conduct and course of the hearing consistent with due process to ensure an orderly hearing; (g) order, where relevant and necessary, an independent medical assessment or professional evaluation from a source mutually satisfactory to the appellant and the State Agency; and (f) render a hearing decision which will resolve the dispute, within 45 days of the initial request for a hearing.

## ***Appendix A***

### **Designated State Agency**

Vermont Department of Disabilities, Aging and Independent Living  
Patrick Flood, Commissioner  
103 South Main Street  
Waterbury, Vermont 05671-2301

Phone: (802) 244-2401

Fax: (802) 241-2325

### **Contract Agency**

The Vermont Foodbank  
Deborah Flateman, CEO  
33 Parker Road  
Barre, Vermont 05641

Phone: (802) 476-3341

Fax: (802) 476-3326



**Appendix B**     *Delivery sites and schedule*

<b>Town 2</b>	<b>Type of Site</b>	<b>Location or sh site</b>	<b>Date or day</b>	<b>Time</b>
Alburg	TG	Amadeaus Parish Hall	1st Thursday	1:30-2:30
Alburg	SH	Pine Manor	1st Thursday	12:30
Ascutney	SAT	Martin Memorial Hall	3rd Tuesday	12:00-12:30
Barre	TG	Barre Auditorium	3rd Thursday	8:30-11:00
Barre	SH	The Tilden House	1st Thursday	8:30
Barre	SH	North Barre Manor	1st Thursday	1:30
Barre	SH	Washington Apartments	1st Thursday	2:30
Barre	SH	Jefferson Apartments	1st Thursday	2:15
Barton	TG	Barton Fairgrounds (Orleans Fairgr)	4th Thursday	1:00-2:30
Barton	SH	Hillcrest Apartments - Barton	4th Wednesday	1:00
Barton	SH	Monitor Manor - Barton	4th Wednesday	1:30
Barton	SH	Mountain View - Barton	4th Wednesday	2:00
Bellows Falls	SAT	Our Place Drop In Center	1st Tuesday	12:30-1:00
Bellows Falls	SH	Riverview Apartments - Bellows Falls	1st Tuesday	1:45
Bellows Falls	SH	Rockingham Canal House	1st Tuesday	9:00
Bennington	TG	Second Congregational Church	3rd Friday	1:00-2:30
Benson	SH	Benson Heights	2nd Tuesday	2:00
Bethel	SH	Bethel Depot	1st Wednesday	2:00
Bradford	TG	United Church of Christ	3rd Monday	1:00-2:30
Brandon	TG	Illingsworth Hall / Senior Center	1st Wednesday	10:00-11:00
Brandon	SH	Neshobe House	1st Wednesday	9:30
Brandon	SH	Conant Square	1st Wednesday	11:15
Brattleboro	SAT	Brattleboro Area Drop In	2nd Tuesday	9:30
Brattleboro	TG	First United Methodist Church	2nd Tuesday	10:30-12:00
Brattleboro	SH	Fairview Village	3rd Tuesday	2:30
Brattleboro	SH	Elliot Street Apartments	3rd Tuesday	1:00
Bristol	SH	Pleasant Hills	2nd Wednesday	9:30
Bristol	SAT	American Legion - Bristol	2nd Wednesday	10:00-10:30
Burlington	TG	Elks Lodge - Burlington	1st Monday	12:30-2:00
Burlington	SH	Heinberg Senior Housing	1st Monday	11:30
Burlington	SH	St. Paul Street Apartments	2nd Monday	Fd Rescue
Burlington	SH	South Square	3rd Friday	Fd Rescue
Burlington	SH	Fern Hill	3rd Monday	Fd Rescue
Burlington	SH	McKenzie House	4th Friday	Fd Rescue
Burlington	SH	Cathedral Square	4th Monday	Fd Rescue
Burlington	SH	10 North Champlain Street	1st Friday	Fd Rescue
Canaan	SAT	American Legion - Canaan	2nd Monday	1:00-1:30
Castleton	SH	Castleton Meadows	2nd Tuesday	1:30
Chelsea	SAT	Town Center Square - Chelsea	3rd Tuesday	8:30-9:00
Chelsea	SH	Chelsea Court	3rd Tuesday	10:15
Chester	SH	Chester Apartments	3rd Tuesday	12:00
Craftsbury	SAT	Craftsbury Community Care Center	4th Tuesday	10:00-10:30
East Barre	SH	Avery Apartments	1st Thursday	3:00
East Fairfield	SAT	East Fairfield Community Center	2nd Friday	11:00-11:30
Enosburg	TG	St. John the Baptist	1st Thursday	9:30-11:00
Essex	SAT	Grace United Methodist Church	2nd Thursday	1:00-2:00
Essex Jct.	SH	Whitcomb Woods	2nd Thursday	2:30
Fair Haven	TG	St. Mary's School	3rd Wednesday	10:00-11:00
Fair Haven	SH	Appletree Apartments	3rd Wednesday	11:30

Fairfax	SH	Mountain View Apts- St A	2nd Friday	9:30
Franklin	SH	Franklin Homestead	2nd Friday	2:00
Gilman	SAT	Gilman Satellite	2nd Friday	12:30-1:00
Grand Isle	SH	Round Barn Homestead	2nd Thursday	11:00
Grand Isle Village	SAT	Saint Joseph's Church	2nd Thursday	11:30-12:00
Graniteville	SH	Quarry Hill Apartments	1st Thursday	3:30
Greensboro	SH	Laurendon Village Apartments	4th Tuesday	9:00
Groton	SH	Clark's Landing	3rd Monday	8:30
Groton	SAT	Groton Town Garage	3rd Monday	9:00-9:30
Hardwick	SH	Bemis Block	4th Tuesday	8:00
Hardwick	SH	Maple Street - Hardwick	4th Tuesday	8:30
Hardwick	TG	St. Norbert's Catholic Church	4th Tuesday	12:30-2:00
Hinesburg	SAT	Lantman's IGA	2nd Wednesday	11:30-12:00
Hinesburg	SH	Kelley's Field	2nd Wednesday	12:15
Island Pond	TG	American Legion - Island Pond	2nd Monday	11:30-12:30
Island Pond	SH	Sunrise Manor	2nd Monday	11:00
Jay	SM	Jay Food Shelf	2nd Thursday	W/ Rte 18
Jeffersonville	SH	Mann's Meadow	2nd Wednesday	1:00
Jericho	SH	Jeri-Hill	2nd Wednesday	12:30
Johnson	SH	St. Johns Knoll	2nd Wednesday	2:00
Londonderry	SAT	Clark's IGA	2nd Thursday	11:00-11:30
Ludlow	SH	Gill Terrace	2nd Thursday	10:15
Ludlow	SAT	Annunciation Catholic Church	2nd Thursday	9:30-10:00
Lyndonville	SAT	Armory - Lyndonville	4th Thursday	10:30-11:30
Lyndonville	SH	Darling Inn	2nd Friday	3:00
Lyndonville	SH	Lyndon Terrace	2nd Friday	3:15
Lyndonville	SH	Riverside Enrichment Center	2nd Friday	3:30
Manchester	TG	Town Off Sen Meal - Mnchstr	3rd Friday	10:00-11:00
Marshfield	SAT	Onion River Food Shelf	4th Wednesday	Route 1
Middlebury	TG	American Legion - Middlebury	2nd Wednesday	10:00-11:00
Middlebury	SH	The Meadows - Middlebury	2nd Wednesday	10:30
Middlebury	SH	Middlebury Commons	1st Friday	10:45
Milton	SAT	Milton Senior Center	2nd Thursday	9:30-10:30
Montpelier	TG	Elks Lodge - Montpelier	4th Monday	8:30-10:30
Montpelier	SH	Lane Shops	1st Thursday	9:30
Montpelier	SH	Pioneer Apartments	1st Thursday	9:00
Montpelier	SH	Prospect Place	1st Thursday	10:00
Morrisville	TG	Morrisville Grange	4th Monday	9:30-11:00
Morrisville	SH	Lamoille View Apartments	4th Monday	2:00
Morrisville	SH	Copley Terrace	4th Monday	1:30
Newbury	SAT	Newbury Congregational Church	3rd Monday	10:00-10:30
Newfane	SAT	Newbrook Fire Department	2nd Thursday	12:30-1:00
Newport	SH	Newport Place	2nd Monday	9:30
Newport	SH	Governor Prouty Apartments	2nd Monday	10:00
Newport	SH	Governor's Mansion	2nd Monday	10:30
Newport	TG	St. Mary's Catholic Church	4th Wednesday	10:00-12:00
Northfield	SAT	Northfield Senior Center	1st Thursday	11:00-11:30
Northfield	SH	Dogwood Glen Apartments	1st Thursday	10:30
Orleans	SH	Rainbow Apartments	4th Wednesday	12:30
Pawlet	TG	Mettowee Community School	3rd Wednesday	12:30-1:30
Pittsford	SAT	Pittsford Congregational Church	1st Wednesday	9:00

Pittsford	SH	Village Manor	1st Wednesday	11:45
Poultney	SH	School House Apartments	3rd Wednesday	12:30
Proctor	SH	Proctor Place	2nd Tuesday	2:45
Randolph	TG	Randolph Senior Center	4th Friday	9:30-11:00
Randolph	SH	Randolph House	4th Friday	8:30
Richford	SAT	Eastern Ave Town Parking Lot	2nd Friday	12:30-1:00
Richford	SH	Missisquoi Manor	2nd Friday	1:15
Richmond	SH	Richmond Terrace	2nd Friday	Route 11
Rochester	SAT	Rochester Federated Church	1st Wednesday	1:00-1:30
Roxbury	SM	Roxbury Food Shelf	Pick Up	Pick Up
Royalton	TG	Beth-El Fellowship (Journey)	4th Friday	12:30-2:00
Rutland	TG	Rutland Fairgrounds	1st Wednesday	11:00-1:00
Rutland	SH	Colonial Apartments - Rutland	2nd Tuesday	2:30
Rutland	SH	Maple Village - Rutland	2nd Tuesday	10:30
Rutland	SH	Parker House	2nd Tuesday	11:00
Rutland	SH	The Maples-Phase I - Rutland	2nd Tuesday	9:30
Rutland	SH	Templewood Court	2nd Tuesday	9:45
Rutland	SH	Sheldon Towers	2nd Tuesday	10:00
Rutland	SH	Bardwell House	2nd Tuesday	10:15
South Burlington	SH	Country Park - South Burlington	3rd Thursday	Route 14
South Burlington	SH	The Pines	3rd Thursday	Route 14
South Londonderry	SH	Smith Haven Apartments	2nd Thursday	11:45
Springfield	TG	VFW - Springfield	1st Tuesday	10:00-11:30
Springfield	SH	Edwin L. Huber Building	3rd Tuesday	10:30
Springfield	SH	The Maples - Springfield	3rd Tuesday	10:45
Springfield	SH	Louis H. Whitcomb Building	3rd Tuesday	11:00
St. Albans	SH	Lake St Apartments	2nd Monday	9:00
St. Albans	TG	American Legion - St. Albans	2nd Monday	10:00-12:00
St. Albans	SH	Heritage Lane Apartments	2nd Friday	10:15
St. Albans	SH	Beth-El Court	2nd Friday	10:00
St. Albans	SH	Franklin County Senior Center	2nd Monday	9:30
St. Johnsbury	SH	Colonial Apartments - St. Johnsbury	2nd Friday	2:15
St. Johnsbury	SH	Mountainview Apartments	2nd Friday	2:30
St. Johnsbury	SH	St. Johnsbury House	2nd Friday	8:30
St. Johnsbury	TG	Moose Lodge - St. Johnsbury	2nd Friday	9:30-11:30
Stowe	SH	West Branch Apartments	4th Monday	8:30
Swanton	SH	Village Green Apartments	2nd Monday	2:15
Swanton	SAT	Church of the Nativity - Swanton	2nd Monday	1:00-1:30
Swanton	SH	School Apts	2nd Monday	2:30
Swanton	SH	Village Apartments - Swanton	2nd Monday	2:00
Thetford	SAT	Thetford Baptist Church	3rd Monday	11:30-12:00
Vergennes	TG	American Legion - Vergennes	2nd Wednesday	1:00-2:00
Vergennes	SH	Valley View Apartments	2nd Wednesday	2:30
Wallingford	SH	Wallingford House	2nd Tuesday	USDA 2B
Waitsfield	SM	Mad River Valley	2nd Tuesday	USDA 2A
Waterbury	SH	Fairground Apartments	4th Monday	12:00
Waterbury	SH	Stimson Graves	4th Monday	12:30
Waterbury	TG	St Andrew's Church	4th Monday	12:00-1:00
West Barnet	SM	West Barnet Senior Meal Site	4th Wednesday	Route 1

West Brattleboro	SH	Hayes Court	3rd Tuesday	2:00
West Brattleboro	SH	Melrose Terrace	3rd Tuesday	1:30
West Burke	SM	Pilgrim Manor	4th Thursday	Route 2
Westfield	SAT	Westfield Community Center	4th Monday	12:30-1:00
White River Junction	TG	Bugbee Senior Center	3rd Tuesday	1:00-2:30
White River Junction	SH	Graystone Village	3rd Tuesday	9:00
Wilder	SH	Windsor Hollow	3rd Tuesday	9:30
Williston	SH	Eagle Crest	1st Monday	Food Rescue
Wilmington	SAT	Our Lady of Fatima	2nd Tuesday	1:00-1:30
Windsor	SH	Olde Windsor Village	3rd Tuesday	10:00
Winooski	TG	Winooski Senior Center	1st Monday	9:30-10:30
Winooski	SH	31 East Spring St.	1st Monday	9:00
Winooski	SH	65 Barlow	1st Monday	10:45
Winooski	SH	Courtyard Apartments	1st Monday	8:45
Winooski	SH	83 Barlow - Senior Tower	1st Monday	11:00
Woodstock	SAT	Woodstock Senior Center	3rd Tuesday	10:30-11:00

x/operations/csfp/schedules/2004 csfp distribution

Rpdate 3/05